

September 11, 2020

BY ECF

Honorable Alvin K. Hellerstein
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: United States v. Orsini Quintero, 19 Cr. 144 (AKH)

Hon. Judge Hellerstein:

I write to clarify the basis on which the defense has consented to an exclusion of time between today and the next court date set by the Court.

16 months into this case, the government continues to produce Rule 16 discovery - and not "materials recently produced by the government relating to the Confidential Source in this case". See, Dkt. # 88. It is only because the government continues to provide Rule 16 discovery and Giglio material¹ which impacts the defendant's ability to reach a disposition in this case, that the defense agreed to consent to the exclusion of time in this matter.

I thank the Court for allowing me the opportunity to clarify Mr. Orsini's position.

Respectfully submitted,

/s/Sabrina P. Shroff
Counsel to Mr. Orsini Quintero

cc: All counsel
Mr. Orsini Quintero (via mail)

¹ Despite repeated requests the Government continues in its refusal to provide to us the amount of money provided by law enforcement to its confidential source. We have requested, and not yet received, the other benefits that the government has bestowed upon the confidential source and his business ventures.